

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

-----X
VLADIMIR DOBROSMYLOV,

Plaintiff,

Civil Action No. 1:19-cv- 05122 (BMC)

DECLARATION OF NED H. BASSEN

v.

DESALES MEDIA GROUP, INC.,

Defendant.

-----X

NED H. BASSEN, under penalty of perjury, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner in Becker & Poliakoff, LLP, attorneys for defendant DeSales Media Group, Inc. (“Defendant DeSales” in the above-captioned case. I am admitted to practice law in the State of New York and in this Court. I submit this declaration in support of Defendant DeSales’ renewed motion for summary judgment. I base this declaration on my personal knowledge and a review of the documents referenced herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the decision in *Rodriguez v. Shan Namken, Inc.*, 3:15-cv-03370-BK (USDC, ND Tex 1/9/17).

3. Attached hereto as **Exhibit 2** is a true and correct copy of the decision in *Martinez v. Jade Palace*, 2:09-cv-00123-KOB (USDC, ND Ala 1/11/10).

4. Attached hereto as **Exhibit 3** is a true and correct copy of the decision in *Walker v. The Interfaith Nutrition Network, Inc.*, 2:14-cv-05419 (DRH) (GRB), July 14, 2015.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the decision in *Whiteside v. Hoover-Davis, Inc., Universal Instruments Corp.*, No. 20-798 (2d Cir. April 27, 2021).

6. Attached hereto as **Exhibit 5** is a true and correct copy of the decision in *Huerta v. Victoria Bakery, et al.*, 1:10-cv-04754-RJD-JO (EDNY 02/17/12).

7. Attached hereto as **Exhibit 6** is a true and correct copy of the decision in *City of Almaty, Kazakhstan v. Ablyazov*, 2018 WL 2148430 (S.D.N.Y. May 10, 2018).

8. Attached hereto as **Exhibit 7** is a true and correct copy of the decision in *Melton v. Tippecanoe County*, 2016 WL5239830 (7th Cir. 2016).

Executed on May 25, 2020
New York, New York

/s/Ned H. Bassen
Ned H. Bassen